

**P O R T E R | S C O T T**

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(*Exempt from Filing Fees Pursuant to Government Code § 6103*)

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA

DOROTHEY HEIMBACH, individually and  
as successor in interest to Anthony Silva,

Plaintiff,

v.

STANISLAUS COUNTY; and JUSTIN  
CAMARA, ZA XIONG, and ERIC  
BAVARO, in their individual capacities,

Defendants.

Case No. 2:23-cv-01887-DJC-CSK

**DEFENDANTS' PROPOSED VERDICT  
FORM**

First Amended Complaint filed: 11/21/2023  
Second Amended Complaint filed: 2/14/2024

Defendants hereby submits the following proposed verdict form:

WE THE JURY UNANIMOUSLY FIND THE FOLLOWING VERDICT ON THE  
SUBMITTED QUESTIONS:

**Question No. 1:** Has Plaintiff on behalf of Anthony Silva proven that a defendant used  
unreasonable force in violation of the Fourth Amendment against Anthony Silva?

Defendant Justin Camera \_\_\_\_\_ YES \_\_\_\_\_ NO

Defendant Za Xiong \_\_\_\_\_ YES \_\_\_\_\_ NO

(Continue to Question 2.)

**Question No. 2:** Does Plaintiff prevail on her familial association claim?

Defendant Justin Camera \_\_\_\_\_ YES \_\_\_\_\_ NO

Defendant Za Xiong \_\_\_\_\_ YES \_\_\_\_\_ NO

*(Continue to Question No. 3.)*

**Question No. 3:** Does Plaintiff prevail on her battery claim on behalf of Anthony Silva?

Defendant Justin Camera \_\_\_\_\_ YES \_\_\_\_\_ NO

Defendant Za Xiong \_\_\_\_\_ YES \_\_\_\_\_ NO

*(Continue to Question No. 4.)*

**Question No. 4:** Does Plaintiff prevail on her wrongful death claim?

Defendant Justin Camera \_\_\_\_\_ YES \_\_\_\_\_ NO

Defendant Za Xiong \_\_\_\_\_ YES \_\_\_\_\_ NO

*(If you answered "yes" to any part of Question No. 1-4, continue to Question No. 5. If you answered "no" to each part of Questions 1-4, then proceed to the last page and sign, date, and return this verdict form.)*

**Question No. 5:** What amount of compensatory damages do you award Plaintiff?

Past Non-Economic Loss \$ \_\_\_\_\_

(Past loss of enjoyment of life and pain and suffering)

Future Non-Economic Loss \$ \_\_\_\_\_

(Future loss of enjoyment of life and pain and suffering)

TOTAL \$ \_\_\_\_\_

*(Continue to Question No. 6.)*

**Question No. 6:** Was Anthony Silva under the influence at the time of the interaction with deputies at the pavilion?

Yes \_\_\_\_\_ No \_\_\_\_\_

*(Continue to Question No. 7.)*

**Question No. 7:** As Deputy Xiong started to escort Anthony Silva for transport, did Anthony Silva physically resist?

Defendant Justin Camera \_\_\_\_\_ YES \_\_\_\_\_ NO

Defendant Za Xiong \_\_\_\_\_ YES \_\_\_\_\_ NO

*(Continue to Question No. 8.)*

**Question No. 8:** As Deputy Xiong started to escort Anthony Silva for transport, did deputies reasonably believe Anthony Silva was attempting to flee?

Defendant Justin Camera \_\_\_\_\_ YES \_\_\_\_\_ NO

Defendant Za Xiong \_\_\_\_\_ YES \_\_\_\_\_ NO

*(Continue to Question No. 9.)*

**Question No. 9:** At the time deputies moved to take Anthony Silva, did any defendant intentionally use force to move him to the ground?

Defendant Justin Camera \_\_\_\_\_ YES \_\_\_\_\_ NO

Defendant Za Xiong \_\_\_\_\_ YES \_\_\_\_\_ NO

*(Continue to Question No. 9.)*

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**Question No. 9:** Did any Defendant prove that, in using any force, he acted in self defense or defense of others?

Defendant Justin Camera \_\_\_\_\_YES \_\_\_\_\_NO

Defendant Za Xiong \_\_\_\_\_YES \_\_\_\_\_NO

*(Continue to Question No. 10.)*

**Question No. 10:** Did any Defendant prove that they exercised due care in the execution or enforcement of any law?

Defendant Justin Camera \_\_\_\_\_YES \_\_\_\_\_NO

Defendant Za Xiong \_\_\_\_\_YES \_\_\_\_\_NO

*(Continue to Question No. 11.)*

**Question No. 11:** Do you find that Anthony Silva was negligent?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, what percentage \_\_\_\_\_

*(Continue to Question No. 12.)*

**Question No. 12:** Has the plaintiff proven any defendant was the cause of the spinal injury to Anthony Silva?

Defendant Justin Camera \_\_\_\_\_YES \_\_\_\_\_NO

Defendant Za Xiong \_\_\_\_\_YES \_\_\_\_\_NO

*(Continue to Question No. 13.)*

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**Question No. 13:** Has the plaintiff proven any defendant was the cause of the death to Anthony Silva?

Defendant Justin Camera \_\_\_\_\_ YES \_\_\_\_\_ NO

Defendant Za Xiong \_\_\_\_\_ YES \_\_\_\_\_ NO

*(Continue to Question No. 14.)*

**Question No. 14:** Assuming that 100% represents the total negligence of all individuals, what percentage of negligence do you assign for the cause of the death of Anthony Silva

Defendant Justin Camera \_\_\_\_\_ %

Defendant Za Xiong \_\_\_\_\_ %

Anthony Silva \_\_\_\_\_ %

Third party \_\_\_\_\_ %

*(Continue to Question No. 15.)*

**Question No. 15:** Do you find that any Defendant acted with a purpose to harm Anthony Silva ?

Defendant Justin Camera \_\_\_\_\_ YES \_\_\_\_\_ NO

Defendant Za Xiong \_\_\_\_\_ YES \_\_\_\_\_ NO

*(For any "no," to Question 15, Continue to Question No. 16; if you answered both yes, skip to the end.)*

**Question No. 16:** Do you find that in using force against Anthony Silva to take him to the ground, did any defendant have time to deliberate about that force?

Defendant Justin Camera \_\_\_\_\_ YES \_\_\_\_\_ NO

Defendant Za Xiong \_\_\_\_\_ YES \_\_\_\_\_ NO

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(For any “yes,” to Question 16, Continue to Question No. 17; if you answered both no, skip to the end.)

**Question No. 16:** Do you find that any Defendant acted with deliberate indifference to Anthony Silva’s constitutional right to be free from excessive force?

Defendant Justin Camera \_\_\_\_\_ YES \_\_\_\_\_ NO

Defendant Za Xiong \_\_\_\_\_ YES \_\_\_\_\_ NO

(Sign, date, and return this verdict form.)

Dated \_\_\_\_\_.

\_\_\_\_\_  
PRESIDING JUROR

Dated: December 11, 2025

PORTER SCOTT  
A PROFESSIONAL CORPORATION

By /s/ John R. Whitefleet  
John R. Whitefleet  
Attorney for Defendants